

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARK WATSON,

Plaintiff,

v.

LIFE INSURANCE COMPANY OF NORTH  
AMERICA d/b/a CIGNA GROUP  
INSURANCE,

Defendant.

CIVIL DIVISION

CASE NO.:

Judge

**COMPLAINT**

FILED ON BEHALF OF:  
PLAINTIFF:  
Mark Watson

COUNSEL FOR THIS PARTY:

Francis M. Moore, Esquire  
PA I.D. #60039

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## **COMPLAINT**

### **Parties**

1. Plaintiff, Mark Watson, is an individual with an address of 44 Woodbridge Park, Weirton, WV 26062.
2. Defendant, Life Insurance Company of North America, is a long term disability insurer, licensed to do business in the Commonwealth of Pennsylvania, with an address of 1601 Chestnut Street, Philadelphia, PA 19192.

### **Jurisdiction**

3. This action is brought under, and jurisdiction of this matter is vested in this Court through the *Employee Retirement Income Security Act* (ERISA), and specifically 29 U.S.C. 1132(e), 502(e) wherein the district courts of the United States shall have exclusive jurisdiction of civil actions under this title brought by the Secretary or by a participant, beneficiary, fiduciary, or any person referred to in ERISA.
4. Venue is proper because Defendant, Life Insurance Company of North America, regularly conducts business in this District.

### **History of Case**

5. This action stems from a policy of long term disability insurance administered by Defendant in which Plaintiff was an insured.
6. Mark Watson was an employee of the Advantage Sales & Marketing, LLC and was insured under a policy of long term disability insurance with the Defendant.
7. Due to significant medical ailments, Mark Watson has become fully disabled.

8. Life Insurance Company of North America denied long term disability benefits to Plaintiff on or about March 15, 2016.
9. Said denial of long term disability benefits was illegal and unreasonable.
10. All administrative appeals have been exhausted.
11. Significant medical evidence was presented to Defendant outlining the nature and extent of Mark Watson's disability. Notwithstanding this medical evidence, Defendant continued to illegally deny Plaintiff long term disability benefits.

**Prayer for Relief**

WHEREFORE, Mark Watson prays for the following relief:

- a. Judgment in his favor and against the Defendant for the amount of all benefits due and owing under the plan with interest as may be permitted by the Court;
- b. An award by the Court for reasonable attorney's fees and costs as provided under the ERISA law, found at section 1132(g), *et seq*; and
- c. Any other legal or equitable relief as the Court deems appropriate.

/s/Francis M. Moore  
Francis M. Moore, Esquire  
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